

**KRONENBERGER BURGOYNE, LLP**

Henry M. Burgoyne, III (CA Bar No. 203748)  
Karl S. Kronenberger (CA Bar No. 226112)  
Jeffrey M. Rosenfeld (CA Bar No. 222187)  
150 Post Street, Suite 520  
San Francisco, CA 94108  
Telephone: (415) 955-1155  
Facsimile: (415) 955-1158  
hank@kronenbergerlaw.com  
karl@kronenbergerlaw.com  
jeff@kronenbergerlaw.com

**SHAPIRO HABER & URMY LLP**

Edward F. Haber (*pro hac* admission pending)  
Todd S. Heyman (*pro hac* admission pending)  
Robert E. Ditzion (*pro hac* admission pending)  
53 State Street  
Boston, MA 02109  
Telephone: (617) 439-3939  
Facsimile: (617) 439-0134  
ehaber@shulaw.com  
theyman@shulaw.com  
rditzion@shulaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**VIOLETTA HOANG, LIVIA HSIAO, and  
MICHAEL BLACKSBURG** individually and  
on behalf of a class of similarly situated  
persons

Plaintiffs,

vs.

**REUNION.COM, INC.**, a California  
corporation,

Defendant.

Case No.

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF**

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**COMPLAINT**

1 Plaintiffs Violetta Hoang, Livia Hsiao, and Michael Blacksborg bring this action on  
2 behalf of themselves and all similarly-situated individuals and allege as follows:

### 3 INTRODUCTION

4 1. In enacting Section 17529.5, the California Legislature found:

5 The increase in spam is not only an annoyance but is also an increasing  
6 drain on corporate budgets and possibly a threat to the continued  
7 usefulness of the most successful tool of the computer age. . . . Like junk  
8 faxes, spam imposes a cost on users, using up valuable storage space in  
9 e-mail inboxes ... and discourages people from using e-mail. . . . Like  
10 traditional paper 'junk' mail, spam can be annoying and waste time, but it  
11 also causes many additional problems because it is easy and inexpensive  
12 to create, but difficult and costly to eliminate. . . . The true beneficiaries of  
13 spam are the advertisers who benefit from the marketing derived from the  
14 advertisements. (Cal. Bus. & Prof. C. §17529.)

15 2. The allegations contained herein and relating to the false and deceptive  
16 email marketing practices of Reunion.com, Inc. ("Reunion.com") paint the very picture of  
17 the harm that 17529 was intended to address: The use by an advertiser of false and  
18 deceptive email headers and subject lines to deceive Internet users into reading  
19 unsolicited commercial emails that such users would otherwise toss in their virtual trash.

20 3. Reunion.com operates an Internet-based social networking website.  
21 Reunion.com advertises itself as the leading social networking service for grown-ups to  
22 reconnect and keep in touch with family, friends, lost loves and colleagues.

23 4. During or prior to the spring of 2008, Reunion.com initiated an email  
24 marketing campaign designed to boost Reunion.com's membership. The campaign  
25 consists of emails (the "Emails") sent by Reunion.com but appearing to come from  
26 individual Reunion.com registered members. Each Email contains a subject line stating  
27 "Please Connect With Me :-)", or "[Member Name] Wants to Connect with You", or  
28 something substantially similar, with no reference to Reunion.com. The body text of  
each Email states, "I looked for you on Reunion.com, but you weren't there. Please  
connect with me so we can keep in touch," or something substantially similar, even

1 though in most or all cases no such search has been conducted.

2 5. The Emails, as received by Plaintiffs Violetta Hoang, Livia Hsiao, Michael  
3 Blackburg and others similarly situated, violate California Business and Professions  
4 Code Section 17529.5(a)(2) and (a)(3), in that each Email: (i) contains falsified,  
5 misrepresented and/or forged header information in the "From" line, which falsely  
6 represents that the Email has been sent from an individual, rather than from  
7 Reunion.com; and (ii) contains a subject line that Reunion.com knows would be likely to  
8 mislead a recipient acting reasonably under the circumstances into believing that the  
9 Email is a personal request to connect with an individual, rather than an unsolicited  
10 commercial email advertisement from Reunion.com.

11 6. On information and belief, many of the Emails, such as those received by  
12 Plaintiff Blackburg, also violate Section 17529.5(a)(1), in that they are deceptively  
13 accompanied in the "From" lines by a third-party's domain name without the permission  
14 of that third party.

15 7. Taken as a whole, the Emails represent a clear attempt by Reunion.com to  
16 disguise the fact that the Emails are unsolicited commercial email advertisements, and  
17 to deceive recipients into opening the Emails on the mistaken belief that they are  
18 personal requests by one individual to "connect" with them. On information and belief,  
19 Reunion.com has sent, and continues to send, millions of the Emails in the regular  
20 course of its business, resulting in this Complaint and accompanying requests for  
21 damages and injunctive relief.

## 22 PARTIES

23 8. Reunion.com, Inc. is a Delaware corporation, registered to conduct  
24 business in California. On information and belief Reunion.com maintains its  
25 headquarters at 2118 Wilshire Blvd., Santa Monica, CA 90403.

26 9. Plaintiff Violetta Hoang ("Hoang") is an individual who resides in San  
27 Francisco, California.

28 10. Plaintiff Livia Hsiao ("Hsiao") is an individual who resides in Foster City,

1 California.

2 11. Plaintiff Michael Blacksborg ("Blacksburg") is an individual who resides in  
3 San Francisco, California.

#### 4 JURISDICTION AND VENUE

5 12. This Court has subject matter jurisdiction over this matter pursuant to 28  
6 U.S.C. §1332(d) because the amount in controversy in this matter exceeds the sum or  
7 value of \$5,000,000 exclusive of interest and costs, and this matter is a class action in  
8 which a member of the class of plaintiffs is a citizen of a state different from the  
9 Defendant, and less than two-thirds of the members of the proposed plaintiff classes in  
10 the aggregate are citizens of California.

11 13. This Court has personal jurisdiction over Reunion.com because  
12 Reunion.com is registered with the California Secretary of State to conduct business  
13 within California, maintains its headquarters and employees within California, and  
14 conducts substantial business within California, such that Reunion.com has significant  
15 continuous and pervasive contacts with the State of California.

16 14. Venue is proper in this Court because Plaintiffs Hoang and Blacksborg  
17 reside in San Francisco, California. Furthermore, Reunion.com's User Agreement  
18 contains a forum selection clause specifying "venue in the federal and state courts  
19 located in San Francisco County, California, U.S.A. in all disputes arising out of or  
20 relating to the Service."

#### 21 INTRADISTRICT ASSIGNMENT

22 15. Pursuant to Local Rule 3-5(b) and 3-2(c), this action should be assigned to  
23 the San Francisco division of the Northern District of California, because Plaintiffs Hoang  
24 and Blacksborg reside in San Francisco, and because the forum selection clause  
25 contained in Reunion.com's User Agreement specifies San Francisco as the appropriate  
26 venue.

27 //

28 //



## GENERAL ALLEGATIONS

### Reunion.com's Business Practices and the Emails

16. Reunion.com operates a social networking Internet website. The Reunion.com website allows members to search for old friends, classmates, and colleagues. A member of the Reunion.com Website can add other members to his or her "Friends" list, thereby creating a social network of Reunion.com members.

17. Reunion.com boasts that it has more than 32 million registered members, a number that it claims is increasing by one million members a month.

18. In order to become a registered member of Reunion.com, a person must provide his or her first name, last name, email address, gender and date of birth. Additionally, Reunion.com asks registered members to provide the password to the registered member's email account.

19. Where provided, Reunion.com uses the registered member's email password to access the registered member's email contacts. As set forth in Reunion.com's Privacy Policy, Reunion.com purports to access the registered member's contacts for the purpose of sending emails "from Reunion.com" to certain or all of those contacts and "inviting them to join" Reunion.com.

20. The emails sent by Reunion.com to registered members' email contacts (as defined above, the "Emails"), however, are disguised so as not to appear to come from Reunion.com, but from registered members personally, in that registered members' names appear in the Emails' "From" lines. In some cases, the "From" lines also contain registered members' personal email addresses, including the domain names of the registered members' email services providers, and, on information and belief, without any authorization from such email services providers.

21. Furthermore, the subject lines of the Emails do not invite recipient contacts to join Reunion.com. Instead, they state, "Please Connect with Me :-)", or "[Member Name] Wants to Connect with You", or something substantially similar, with neither any reference to Reunion.com nor any indication that that the message contains an

1 unsolicited commercial advertisement and/or concerns a commercial subject matter.

2 22. Additionally, the body text of the Emails states, "I looked for you on  
3 Reunion.com, but you weren't there. Please connect with me so we can keep in touch,"  
4 or something substantially similar, even though Reunion.com's registration procedure  
5 does not provide for such searches, and in most or all cases no such searches have  
6 been conducted.

7 23. The Emails' headers and subject lines create the deception of a personal  
8 request from the registered member to "connect" with the recipient, rather than an  
9 unsolicited commercial email advertisement sent from Reunion.com. That deception is  
10 intended by Reunion.com to encourage recipients to open and read the Emails, when  
11 recipients might otherwise ignore the Emails as one more piece of unsolicited  
12 commercial email advertising.

### 13 Emails Received by Plaintiff Hoang

14 24. On or around May 5, 2008 Plaintiff Violetta Hoang received an Email (the  
15 "Hoang Email") from Reunion.com that appeared to have been sent by a former  
16 professor, Troung Tran. A graphical depiction of the Hoang Email appears below:

17 From: **Truong Tran** <verify@relay05.reunion.com>  
18 Date: Mon, May 5, 2008 at 6:41 PM  
19 Subject: Truong wants to connect with you!  
20 To: REDACTED@gmail.com

21 Hi,

22 I looked for you on Reunion.com, but you weren't there. I use Reunion.com to search  
23 for lost friends and contacts, and to stay connected with people I know, so please  
24 connect with me.

25 —Truong

#### 26 **RESPOND TO TRUONG:**

27 [Connect with Truong Now!](#) - You'll also find out if anyone else is searching for you.

28 Or go to <http://www.reunion.com/showInviteRegistration.do?uid=258485053>

#### **Error! Filename not specified.**

Reunion.com - Life Changes. Keep in Touch.™  
You have received this email because a Reunion.com Member sent an invitation to  
this email address. For assistance, please refer to our [FAQ](#) or [Contact Us](#).  
Our Address: 2118 Wilshire Blvd., Box 1008, Santa Monica, CA 90403-5784

25. The "From" line of the Hoang Email was false and/or misrepresentative because it created the deception that the Hoang Email was from Tran Truong and not from Reunion.com.

26. The subject line of the Hoang Email was false and/or misleading because it created the deception that the Hoang Email was a personal request by Truong to connect with Hoang, and not an unsolicited commercial email advertisement from Reunion.com.

### Emails Received by Plaintiff Hsiao

27. On or around May 5, 2008 Plaintiff Livia Hsiao received three Emails (collectively, the "Hsiao Emails") from Reunion.com that appeared to have been sent from, respectively, friends Esther Kang, Vivian Yeh, and Andrea Wong. Graphical depictions of the Hsiao Emails appear below:

From: **Esther Kang** <[verify@relav05.reunion.com](mailto:verify@relav05.reunion.com)>  
 Date: Mon. May 5, 2008 at 8:46 PM  
 Subject: Esther wants to connect with you!  
 To: "REDACTED" <[REDACTED@gmail.com](mailto:REDACTED@gmail.com)>

Hi,

I looked for you on Reunion.com, but you weren't there. I use Reunion.com to search for lost friends and contacts, and to stay connected with people I know, so please connect with me.

—Esther

#### **RESPOND TO ESTHER:**

[Connect with Esther Now!](#) - You'll also find out if anyone else is searching for you.

Or go to <http://www.reunion.com/showInviteRegistration.do?uid=258498145>

#### **Error! Filename not specified.**

Reunion.com - Life Changes. Keep in Touch.™

You have received this email because a Reunion.com Member sent an invitation to this email address. For assistance, please refer to our [FAQ](#) or [Contact Us](#).

Our Address: 2118 Wilshire Blvd., Box 1008, Santa Monica, CA 90403-5784

//

//

//

From: Vivian Yeh <verifv@relav05.reunion.com>

Date: Mon, May 5, 2008 at 8:56 PM

Subject: Vivian wants to connect with you!

To: Redacted @gmail.com

Hi,

I looked for you on Reunion.com, but you weren't there. I use Reunion.com to search for lost friends and contacts, and to stay connected with people I know, so please connect with me.

—Vivian

**RESPOND TO VIVIAN:**

Connect with Vivian Now! - You'll also find out if anyone else is searching for you.

Or go to <http://www.reunion.com/showInviteRegistration.do?uid=258500422>

**Error! Filename not specified.**

Reunion.com - Life Changes. Keep in Touch.™

You have received this email because a Reunion.com Member sent an invitation to this email address. For assistance, please refer to our [FAQ](#) or [Contact Us](#).  
Our Address: 2118 Wilshire Blvd., Box 1008, Santa Monica, CA 90403-5784

From: Andrea Wong <verifv@relav05.reunion.com>

Date: Mon, May 5, 2008 at 10:06 PM

Subject: Andrea wants to connect with you!

To: Redacted @gmail.com

Hi,

I looked for you on Reunion.com, but you weren't there. I use Reunion.com to search for lost friends and contacts, and to stay connected with people I know, so please connect with me.

—Andrea

**RESPOND TO ANDREA:**

Connect with Andrea Now! - You'll also find out if anyone else is searching for you.

Or go to <http://www.reunion.com/showInviteRegistration.do?uid=229123621>

**Error! Filename not specified.**

Reunion.com - Life Changes. Keep in Touch.™

You have received this email because a Reunion.com Member sent an invitation to this email address. For assistance, please refer to our [FAQ](#) or [Contact Us](#).  
Our Address: 2118 Wilshire Blvd., Box 1008, Santa Monica, CA 90403-5784

KRONENBERGER BURGOYNE, LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108  
www.KronenbergerLaw.com

//

//

//



1           28. The "From" lines of the Hsiao Emails were false and/or misrepresentative  
2 because they created the deception that the Hsiao Emails were from Kang, Yeh and  
3 Wong, and not from Reunion.com.

4           29. The subject lines of the Hsiao Emails were false and/or misleading  
5 because they created the deception that the Hsiao Emails were personal requests by  
6 Kang, Yeh and Wong to connect with Hsiao, and not unsolicited commercial email  
7 advertisements from Reunion.com.

8                           **Email Received by Plaintiff Blacksburg**

9           30. On or around July 17, 2008 Plaintiff Michael Blacksburg received an Email  
10 (the "Blacksburg Email") from Reunion.com that appeared to have been sent by Erick  
11 Dunn, a member of a Google electronic mailing list referred to as:  
12 FOOLD@GOOGLEGROUPS.COM. An electronic mailing list is comprised of a program  
13 that enables a person to subscribe to a list by supplying his or her email address.  
14 Thereafter, any subscriber may send an email to a single email address (often referred  
15 to as a "reflector"), and the electronic email address program re-sends that email to all of  
16 the other subscribers on the list. An electronic mailing list is not a natural person.

17           31. A graphical depiction of the Blacksburg Email, along with the reflector,  
18 FOOLD@GOOGLEGROUP.S.COM, appear below:

19  
20  
21  
22  
23  
24  
25  
26 //

27 //

28 //

1 --- On Thu, 7/17/08, Erick Dunn <Redacted @yahoo.com> wrote:  
 2 From: Erick Dunn <Redacted @yahoo.com>  
 3 Subject: [Fool'd] Please connect with me :)  
 4 To: foold@googlegroups.com  
 5 Date: Thursday, July 17, 2008, 11:45 AM

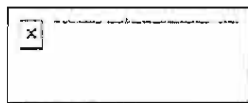
6 **I looked for you on Reunion.com, but you weren't there.  
 7 Please connect with me so we can keep in touch.**

8 **Do you know Erick?**

9

10

11 Tell us, and see who's searching for you!



13 **Reunion.com - Find Everyone from Your Past.™**

14 You have received this email because a Reunion.com Member  
 15 sent an invitation to this email address.

16 For assistance, please refer to our [FAQ](#) or [Contact Us](#).

Our Address: 2118 Wilshire Blvd., Box 1000, Santa Monica, CA 90405-5704

Post: [foold@googlegroups.com](mailto:foold@googlegroups.com)

Unsubscribe: [foold-unsubscribe@googlegroups.com](mailto:foold-unsubscribe@googlegroups.com)

Visit: <http://groups.google.com/group/foold?hl=en>

17 32. The Blacksburg Email was sent to the entire electronic mailing list  
 18 membership because the mailing list address was listed as one of Dunn's email  
 19 contacts.

20 33. The "From" line of the Blacksburg Email was false and/or  
 21 misrepresentative because it created the deception that the Blacksburg Email was from  
 22 Dunn and not from Reunion.com. In addition, on information and belief, the Blacksburg  
 23 Email was deceptively accompanied by and/or contained a third party's domain name,  
 24 "yahoo.com", without the permission of that third party.

25 34. The subject line of the Blacksburg Email was false and/or misleading  
 26 because it created the deception that the Blacksburg Email was a personal request by  
 27 Dunn to connect with Blacksburg, and not an unsolicited commercial email  
 28 advertisement from Reunion.com.

## CLASS ACTION ALLEGATIONS

35. Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Hoang, Hsiao and Blacksburg bring this action on their own behalf and as representatives of all individuals who, at a time they were not registered members of Reunion.com, received one or more Emails from the date three years prior to the filing of this action up to and including the date of final judgment ("the Class").

36. Pursuant to Federal Rule of Civil Procedure 23 (c) (5), Plaintiff Blacksburg brings this action on his own behalf and as a representative of all individuals who, at a time they were not registered members of Reunion.com, received one or more Emails that specified in the "From" line a non-Reunion.com domain name from the date three years prior to the filing of this action up to and including the date of final judgment ("the Third Party Domain Subclass" or "Subclass").

37. A class action is proper under Federal Rule of Civil Procedure 23 because:

- a) the Class and Subclass are so numerous that joinder of all members is impracticable,
- b) there are questions of law and fact that are common to the Class and Subclass, c) the claims of the representative Plaintiffs are typical of the claims of the Class and Subclass, and the representative Plaintiffs will fairly and adequately protect the interests of the Class and Subclass. A class action is the superior method of adjudicating this controversy because under Rule 23(b)(3), questions of law and fact common to the Class and Subclass members predominate over any question affecting only individual members.

38. The common questions of law and fact include:

- Whether Reunion.com advertised in the Emails within the meaning of Cal. Bus. & Prof. C. §§17529.1 and 17529.5;
- Whether the Emails were sent from California and/or sent to California electronic mail addresses, within the meaning of Cal. Bus. & Prof. C. §§17529.5(a);
- Whether the Emails constitute unsolicited commercial email

advertisements within the meaning of Cal. Bus. & Prof. C. §§17529.1(c) & (o);

- Whether the Emails contain falsified, misrepresented and/or forged header information in violation of California Business and Professions Code Section 17529.5(a)(2);
- Whether the Emails contain a subject line that Reunion.com knows would be likely to mislead a recipient, acting reasonably under the circumstances, about a material fact regarding the contents or subject matter of the message in violation of California Business and Professions Code Section 17529.5(a)(3); and
- Whether the Emails that are sent from third party email accounts deceptively contain or are accompanied by a third-party's domain name without the permission of the third party in violation of California Business and Professions Code Section 17529.5(a)(1) (on behalf of the Third Party Domain Subclass only).

39. Plaintiffs can and will fairly and adequately represent and protect the interests of the Class and Subclass because:

- All of the questions of law and fact regarding the liability of Reunion.com are common to the Class and Subclass and predominate over any individual issues that may exist, such that by prevailing on their own claims, Plaintiffs will necessarily establish the liability of Reunion.com to all Class and Subclass members;
- Without the representation provided by Plaintiffs, it is unlikely that any Class or Subclass members would receive legal representation and/or obtain recourse for the misconduct carried out by Reunion.com; and
- Plaintiffs have retained competent attorneys who are experienced both in the conduct of class actions and the law governing

1 unsolicited commercial email advertising. Plaintiffs and their  
2 counsel have the necessary resources to litigate this class action,  
3 and Plaintiffs and their counsel are aware of their fiduciary  
4 responsibility to the Class and Subclass members and are  
5 determined to discharge those duties to obtain the best possible  
6 recovery for the Class and Subclass.

7  
8 **FIRST CAUSE OF ACTION**

9 **Violation of Cal. Bus. & Prof. Code §17529.5(a)(1)**

10 **(Brought by Blacksborg, individually and on behalf**  
11 **of the Third Party Domain Subclass)**

12 40. Plaintiffs incorporate by reference the allegations of fact set forth in the  
13 paragraphs 1 through 39.

14 41. Blacksborg and each member of the Third Party Domain Subclass were  
15 recipients of unsolicited commercial email advertisements sent by Reunion.com, referred  
16 to herein as the "Emails" during the relevant time period. On information and belief, the  
17 Emails were either sent from California and/or sent to California electronic mail  
18 addresses.

19 42. The Emails received by Blacksborg and the members of the Third Party  
20 Domain Subclass deceptively contained or were accompanied by third-party domain  
21 names without the permission of the third parties. To wit, the "From" line of the Emails  
22 received by Blacksborg and members of the Third Party Domain Subclass contained an  
23 individual email address incorporating a third-party domain name, creating the deception  
24 that the Email was from the individual user of that email address and/or the third party  
25 and not from Reunion.com.

26 43. On information and belief, the Emails received by Blacksborg and the  
27 members of the Third Party Domain Subclass were sent without the permission of the  
28 third party whose domain name appeared in the "From" line.



44. Reunion.com's deceptive conduct entitles Blacksbury and each member of the Third Party Domain Subclass to liquidated damages of one thousand dollars for each unsolicited commercial email advertisement transmitted in violation of Cal. Bus. & Prof. C. §17529.5 as that term is defined in Cal. Bus. & Prof. C. §17529.1.

## SECOND CAUSE OF ACTION

### Violation of Cal. Bus. & Prof. Code §17529.5(a)(2)

(Brought by Hoang, Hsiao and Blacksbury,  
individually and on behalf of the Class)

45. Plaintiffs incorporate by reference the allegations of fact set forth in the paragraphs 1 through 44.

46. Hoang, Hsiao, and Blacksbury, and each member of the Class, were recipients of unsolicited commercial email advertisements sent by Reunion.com, referred to herein as the "Emails."

47. On information and belief, the Emails were either sent from California and/or sent to California electronic mail addresses.

48. The Emails contained or were accompanied by falsified, misrepresented, or forged header information. To wit, the Emails contained falsified, misrepresented and/or forged header information in the "From" line, which falsely represented that the Email had been sent from an individual, rather than from Reunion.com.

49. Reunion.com's conduct entitles Plaintiffs and the Class to liquidated damages of one thousand dollars for each unsolicited commercial email advertisement transmitted in violation of Cal. Bus. & Prof. C. §17529.5 as that term is defined in Cal. Bus. & Prof. C. §17529.1.

//

//

//

**THIRD CAUSE OF ACTION**

**Violation of Cal. Bus. & Prof. Code §17529.5(a)(3)**

**(Brought by Hoang, Hsiao and Blacksborg,  
individually and on behalf of the Class)**

50. Plaintiffs incorporate by reference the allegations of fact set forth in the paragraphs 1 through 49.

51. Hoang, Hsiao and Blacksborg, and each member of the Class, were recipients of unsolicited commercial email advertisements sent by Reunion.com, referred to herein as the "Emails."

52. On information and belief, the Emails were either sent from California and/or sent to California electronic mail addresses.

53. The Emails contained subject lines that Reunion.com knew were likely to mislead the recipients, acting reasonably under the circumstances, about a material fact regarding the contents of the subject matter of the messages. To wit, each Email contained a subject line stating "Please Connect With Me :-)", or "[Member Name] Wants to Connect with You", or something substantially similar, with no reference to Reunion.com. Reunion.com knew these subject lines would be likely to mislead a recipient acting reasonably under the circumstances into believing that the Email was a personal request to connect with an individual, rather than an unsolicited commercial email advertisement from Reunion.com.

54. Reunion.com's conduct entitles Plaintiffs and the Class to actual damages and/or liquidated damages of one thousand dollars for each unsolicited commercial email advertisement transmitted in violation of Cal. Bus. & Prof. C. §17529.5, , as that term is defined in Cal. Bus. & Prof. C. §17529.1.

**PRAYER**

WHEREFORE, Plaintiffs respectfully request judgment as follows:

1. That the Court enter a judgment against Reunion.com that it has:

- a. Violated Cal. Bus. Cal. Bus. & Prof. C. §17529.5(a)(1) as to Plaintiff  
Blacksburg and members of the Third Party Domain Subclass;
- b. Violated Cal. Bus. Cal. Bus. & Prof. C. §17529.5(a)(2) and (a)(3) as to  
Plaintiffs Hoang, Hsiao, Blacksburg and members of the Class;
2. That the Court enter a preliminary and permanent injunction enjoining  
Reunion.com and its agents, employees, representatives, and successors and  
predecessors in interest from:
  - a. Engaging in violations of Cal. Bus. & Prof. C. §17529.5, or otherwise  
sending false, deceptive, or misleading emails.
3. That the Court order Reunion.com to pay Plaintiffs' and the Class members' as  
follows:
  - a. Statutory damages in the amount of \$1000 per each email advertisement  
received by members of the Recipient Class pursuant to Cal. Bus. & Prof.  
C. §17529.5;
  - b. Plaintiffs' costs and attorneys' fees incurred by Plaintiffs in prosecuting this  
action, pursuant to Cal. Bus. & Prof. C. §17529.5;
  - c. Interest, including prejudgment interest, on the foregoing sums;
4. That the Court grant to Plaintiffs such additional relief as is just and proper.

DATED: July 23, 2008

KRONENBERGER BURGOYNE, LLP

By: \_\_\_\_\_

Henry M. Burgoyne, III  
Attorneys for Plaintiffs

REQUEST FOR JURY TRIAL

Plaintiffs hereby demand a trial of this action by jury.

DATED: July \_\_, 2008

KRONENBERGER BURGOYNE, LLP

By: 

Henry M. Burgoyne, III  
Attorneys for Plaintiffs

KRONENBERGER BURGOYNE, LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108  
www.KronenbergLaw.com